

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**REMBRANDT 3D HOLDING LTD,**

**Plaintiff,**

**v.**

**WILLIAM A. HOMONY, AS CHAPTER 11  
TRUSTEE, *et al.*,**

**Defendants.**

**Case No. 2:24-cv-6706-JMY**

**DEFENDANTS' JOINT MOTION TO DISMISS COMPLAINT**

William A. Homony, in his capacity as Chapter 11 Trustee (the "Trustee") of the bankruptcy estates of Stream TV Networks, Inc. ("Stream") and Technovative Media Inc. ("Technovative," and collectively with Stream, the "Debtors"), SSG Advisors, LLC, J. Scott Victor, Teresa C. Kohl, Craig D. Warznak, Alexander D. Lamm, and Samuel P. Charlton, by and through their undersigned counsel, hereby move this Honorable Court, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss the Complaint [D.I. 1] filed against them in the above-captioned action by plaintiff Rembrandt 3D Holding Ltd.

Dated: April 4, 2025

Respectfully submitted,

/s/ Jeffrey Kurtzman  
Jeffrey Kurtzman, Esquire  
KURTZMAN STEADY, LLC  
555 City Avenue, Suite 480  
Bala Cynwyd, PA 19004  
Telephone: (215) 883-1600  
kurtzman@kurtzmansteady.com

/s/ Steven M. Coren  
Steven M. Coren, Esquire  
COREN & RESS, P.C.  
Two Commerce Square, Suite 3900  
2001 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 735-8700  
scoren@kcr-law.com

*Counsel to SSG Advisors, LLC, J. Scott  
Victor, Teresa C. Kohl, Craig D. Warznak,  
Alexander D. Lamm, and Samuel P.  
Charlton*

and

/s/ Michael D. Vagnoni

Michael D. Vagnoni, Esquire

Edmond M. George, Esquire

OBERMAYER REBMANN MAXWELL & HIPPEL  
LLP

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

Telephone: (215) 665-3066

*Counsel to the Trustee*